

SEMERARO & FAHRNEY, LLC

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DAVID J. LORENZO,

Plaintiff

vs.

THE BOROUGH OF PALISADES
PARK, NEW JERSEY; CHONG
PAUL KIM (individually and in his
official capacity as Mayor of the
Borough of Palisades Park, New
Jersey); and SUK “JOHN” MIN
(Individually and in his official
capacity as a member of the Borough
Council of Palisades Park, New Jersey)

Defendants.

CIV No.: 2:23-CV-21849-CCC-JRA

A Civil Action

**NOTICE OF MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF’S
COMPLAINT ON BEHALF OF
DEFENDANTS**

To:

Clerk of the Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Richard Malagiere, Esq.
Law Office of Richard Malagiere, P.C.
250 Moonachie Road, Suite 300A
Moonachie, New Jersey 07074
Attorneys for Plaintiff

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants, The Borough of Palisades Park, Chong Paul Kim, and Suk “John” Min (“Defendants”) moves before the Hon. Claire C. Cecchi, U.S.D.J., pursuant to Fed. R. Civ. P. 7(b) and L. Civ. R. 7(m) for an Order extending State Defendants’ time to answer or otherwise respond to Plaintiffs’ Complaint to January 16, 2024.

Defendants shall rely on the within Certification of Counsel being filed with this Notice of Motion, in support of this motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to Fed. R. Civ. P. 78.

A proposed form of Order is attached hereto.

Semeraro & Fahrney, LLC
Attorneys for Defendants

By: 
R. Scott Fahrney, Esq.,

Dated: December 15, 2023